

1 [Submitting Counsel below]
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IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

8 IN RE: UBER TECHNOLOGIES, INC.,
9 PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

10 This Document Relates to:
11
12 ALL CASES

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

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14 **TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:**

15 Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs hereby move the Court to consider
16 whether certain materials should be sealed. Plaintiffs file these materials under seal out of an
17 abundance of caution because they contain references to documents produced and marked
18 confidential by Uber.

19 **Material To Be Filed Under Seal**

20 The material to be filed under seal is an exhibit to the Declaration of Roopal Luhana in
21 Support of Plaintiffs' Brief in Opposition to Defendants' Motion for Protective Order [ECF Nos.
22 2518 and 2519]. Plaintiffs request the Court consider whether the following should be filed under
23 seal:
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Document	Description	Designating Party
Exhibit 4 to Dec. of R. Luhana ISO Plaintiffs' Brief in Opposition to Defendants' Motion for Protective Order	Document and information deemed confidential	Uber

Under Local Rule 79-5(f)(3), the Designating Party bears responsibility to establish that all of the designated material is sealable, and must “file a statement and/or declaration as described in subsection (c)(1)” of the Local Rules. None of the information at issue was marked confidential by Plaintiffs. Pursuant to the Court’s order at Dkt. 1559, Uber must file its statement within one day.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Roopal P. Luhana in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: March 18, 2025

Respectfully submitted,

By: /s/ Roopal P. Luhana

Roopal P. Luhana

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CERTIFICATE OF SERVICE

2 I hereby certify under penalty of perjury that on March 18, 2024, I authorized the
3 electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system,
4 which will send notification of such filing to registered parties.

/s/Roopal Luhana